

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10036
(212) 223-0400
FAX: (212) 753-0396
www.zeklaw.com

35 MASON STREET
GREENWICH, CT 06830
(203) 622-0900
FAX: (203) 862-9889

STEVEN S. RAND
(212) 826-5307
srand@zeklaw.com

103 EISENHOWER PARKWAY
ROSELAND, NJ 07068
(973) 618-9100
FAX: (973) 364-9960

March 5, 2015

VIA ECF

Honorable Katherine B. Forrest
United States District Judge
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007


**Grand Manor Health Related Facility, Inc. v. Koskinen, et al.,
Civ. No. 14-10130 (KBF)**

Dear Judge Forrest:

I am counsel to defendant Berkadia Commercial Mortgage LLC ("Berkadia") in the referenced matter. On consent of all parties, I am writing to request a two-week extension, to Monday, March 23, 2015, of Berkadia's time to answer the Complaint in this action. Our Answer is due on Monday, March 9, 2015. Berkadia requests this extension as the parties are working toward a resolution of a final stipulation and interim stay agreement to resolve the dispute in this action. Berkadia has made no previous request for an extension of time to answer the Complaint.

We thank the Court for its attention to this matter.

Respectfully submitted,


Steven S. Rand

SSR:mzg

cc: Roy Breitenbach, Esq. (by ECF)
John Macron, Esq. (via email)
Natasha L. Waglow, Esq. (via email)